STUDY ON AGENCY IMPLEMENTATION OF RECOVERY AUDITING REQUIREMENTS

UNITED STATES
CHIEF FINANCIAL OFFICERS COUNCIL

August 31, 2016

FROM: Chief Financial Officers Council

SUBJECT: Study on Agency Implementation of Payment Recovery Audit Requirements

As part of the Improper Payments Elimination and Recovery Act (IPERA),[1] the Chief Financial Officers Council (CFOC),[2] in consultation with the Council of Inspectors General on Integrity and Efficiency (CIGIE),[3] is required to conduct a study on payment recovery audits (also referred to as payment recapture audits). The study focuses on the implementation of IPERA payment recovery audit requirements, as well as the costs and benefits of payment recovery audit activities. This study consists primarily of a review and analysis of Agency Financial Reports (AFRs) or Performance and Accountability Reports (PARs), a survey completed by all 24 CFO Act agencies, and a review of improper payment literature. The attached report includes a summary of the study findings.

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[1] Public Law 111-204
[2] www.cfoc.gov
[3] www.ignet.gov

Study on Agency Implementation of Payment Recovery Audit Requirements

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Summary

In order to reduce improper payments, the President signed into law the Improper Payments Elimination and Recovery Act (IPERA)[4] on July 22, 2010. As part of IPERA, the CFOC is required to conduct a one-time study on payment recovery audits, also known as payment recapture audits, with a focus on:

- The implementation of IPERA payment recapture audit requirements; and
- The costs and benefits of payment recapture audit activities.

For this study we relied on the agencies' determination of cost effectiveness in the areas in which they are performed and not cost effective where agencies indicated they are not. We did not perform any work to validate this determination. During the period covered in this study – fiscal year (FY) 2013 to FY 2015 – Federal Government awards totaled $1.35 trillion for contracts, $1.74 trillion for grants, $12.8 billion for loans, and $5.4 trillion in other financial assistance[5]. During this same period, the Government has identified roughly $367.3 billion[6] in improper payments. This study is focused only on payment recovery audits, which our evidence indicates are most effective at returning contract dollars and are used by most (21 of 24) CFO Act agencies. While limitations on effectiveness may exist when used for other payment types, payment recovery audits have identified $79.2 billion and recovered over $21 billion (27.3 percent) in improper payments between FY 2013 and FY 2015. Payment recovery audits will continue to be an effective tool in the improper payment reduction effort.

While recovering improper payment contract dollars is relatively straightforward with a buyer-seller relationship, this is not true for all types of payments. Federal payments are often made through "one-way" arrangements such as grants, benefits, and loans. In these instances, the comparably low recovery rate inherent to the payment type makes the use of payment recovery audits fail the cost-effectiveness test. Pre-payment efforts to increase data verification and validation would be more effective for these payments.

The research reviewed for this report indicates a widespread shift in focus on improper payment efforts is underway. Survey results and research show that additional efforts to chase improperly made payments may yield little additional value in areas where improper payments are most prevalent. This shift in focus to preventative measures will not reduce payment recovery audit efforts, but instead add value in areas where payment recapture audits have not been cost effective. This report also found that in addition to increasing preventative measures, improving the cost-effectiveness of payment recovery audits would be helpful. One suggested way to do this is by increasing the rate at which agencies are allowed to retain recaptured payments.

[4] Public Law 111-204
[5] https://www.usaspending.gov/Pages/TextView.aspx?data=OverviewOfAwardsByFiscalYearTextView
[6] $136.9 billion in FY 2015, $124.6 billion in FY 2014, and $105.8 billion in FY 2013

Study Overview

In order to reduce improper payments, the President signed into law the Improper Payments Elimination and Recovery Improvement Act of 2012 (IPERIA)[7] which enhanced the Administration's efforts to prevent, reduce, and recapture improper payments.

As part of IPERA, the CFOC was required to conduct a one-time study on payment recovery audits, also known as payment recapture audits,[8] in consultation with CIGIE and with a focus on:

- The implementation of IPERA payment recapture audit requirements; and
- The costs and benefits of payment recapture audit activities, including:
    - Activities described under Section 2, Subsection (h) of IPERA; and
    - The effectiveness of using the services of private contractors, agency employees, cross-servicing from other agencies, or any combination of these services.

IPERA Section 2, Subsection (h) Recovery Audits

IPERA Section 2, Subsection (h) addresses requirements for recovery audits/payment recapture audits and is further explained in Appendix C to the Office of Management and Budget (OMB) Circular A-123, *Requirements for Effective Estimation and Remediation of Improper Payments*.[9]

> Agencies are required to have a cost-effective program of internal control to prevent, detect and recover overpayments. A program of internal control may include policies and activities, such as prepayment reviews, a requirement that all relevant documents be made available before making payments, and performance of post-award audits. Effective internal controls should include payment recapture auditing techniques such as data-matching with Federal, State and local databases and data mining and predictive modeling to identify improper payments. However, for agencies that have programs or activities[10] that expend $1 million or more annually, a payment recapture audit program is a required element of their internal controls over payments if conducting such audits is cost-effective. These payment recapture audits should be implemented in a manner designed to ensure the greatest financial benefit to the Federal Government.

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[7] Public Law 112-248

[8] A "payment recapture audit" has the same meaning as the term "recovery audit" as defined in Appendix C to OMB Circular A-123. A recovery audit is defined as a review and analysis of the agency's books, supporting documents, and other available information supporting its payments that is specifically designed to identify overpayments that are due to payment errors. It is not an audit in the traditional sense. It is a control activity designed to assure the integrity of payments and, as such, is a management function and responsibility.

[9] www.whitehouse.gov/omb/circulars

[10] "Programs or activities" are defined in OMB Circular A-123, Appendix C as including, "activities or sets of activities recognized as programs by the public, OMB, or Congress, as well as those that entail program management of policy direction. This definition includes, but is not limited to, all grants including competitive grant programs and block/formula grant programs, non-competitive grants such as single-source awards, regulatory activities, research and development activities, direct Federal programs, all types of procurements, and credit programs. It also includes the activities engaged in by the agency in support of its programs."

IPERA expanded the requirements for payment recapture audits to include all programs and activities that expend $1 million or more annually, including grants, benefits, loans, and contracts. Before IPERA, only contracts that expended $500 million or more annually were subject to payment recapture audit activities.

In determining whether a payment recapture audit is cost-effective, OMB Circular A-123, Appendix C states that agencies should consider the following criteria:

- The likelihood that identified overpayments will be recaptured. For example:
    - Whether laws or regulations allow recovery;
    - Whether the recipient of the overpayment is likely to have resources to repay overpayments from non-Federal funds;
    - Whether the evidence of overpayment is clear and convincing (e.g., the same invoice was paid twice), as opposed to whether the recipient of an apparent overpayment has grounds to contest, and the agency's assessment of the strength of the recipient's counterargument; and
    - Whether the overpayment is truly an improper payment that can be recovered rather than a failure to properly document compliance.

- The likelihood that the expected recoveries will be greater than the costs incurred to identify and recover the overpayments. For example:

    - Can efficient techniques such as sophisticated software and matches be used to identify significant overpayments at a low cost per overpayment or will labor-intensive manual reviews of paper documentation be required?
    - Are tools available to perform the payment recapture audit efficiently and minimize payment recapture audit costs? Payment recapture audits are generally most efficient and effective where there is a central electronic database (e.g., a database that contains information on transactions and eligibility information) where sophisticated software can be used to perform matches and analysis to identify recoverable overpayments (e.g., duplicate payments).
    - How expensive will attempts to recover some or all of the overpayments be, particularly in complex financial situations, and when recipients may contest the assertion of an overpayment, especially when litigation is anticipated (in which situations, the agency should consult with its counsel and, as appropriate, with the Department of Justice)?

Payment recapture audits may be performed by the employees of an agency, by any other department or agency of the Federal Government acting on behalf of the agency, by non-Federal entities expending Federal awards (such as non-profit organizations, or State and local Governments), by contractors performing payment recapture audit services under contracts by the executive agency, or any combination of these options.

Study Design

This study focuses on the 24 CFO Act agencies and consists of the following components:

Survey completed by all 24 CFO Act agencies

Each CFO Act agency completed a survey in 2013 consisting of seven questions. The survey questions and collective results can be found in Appendix A, Payment Recovery Audit Survey Results. The objective of the survey was to gain a better understanding of agencies' payment portfolios, their payment recovery audit operations, other oversight methods, and reasons for not expanding payment recovery audit activities.

Review of Agency Reported Information

Agency Performance and Accountability Reports (PARs) or Agency Financial Reports (AFRs) were reviewed for FY 2013 through FY 2015. The areas of interest included data on amounts identified and recovered through payment recovery efforts and whether payment recovery audits were deemed cost effective.

Review of Improper Payment/Payment Recovery Audit Literature

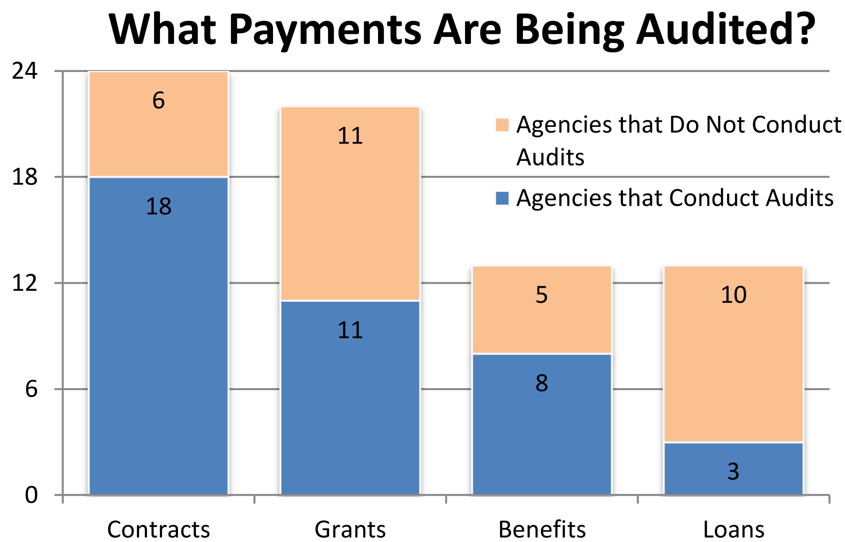
Improper payment/payment recovery audit studies and white papers from various Federal financial management organizations[11] were reviewed. These documents provided greater context on trends seen in agency survey results and agency reporting.

[11] Reports from Informatica, Deloitte, Association of Government Accountants (AGA), U.S. Government Accountability Office (GAO), and Office of Management and Budget (OMB) were cited, although other papers were also reviewed.

Survey Findings

What payments are agencies making and which payments are they auditing?

Agencies were asked to identify which of the four most prevalent types of payments (contracts, grants, benefits, and loans) their agency makes and for which of those payments they conduct payment recovery audits.



Due to the stipulation that payment recovery audits should be conducted only if they are cost effective, it is not expected that all agencies conduct audits on all payments.

All agencies indicated that they make contract payments, with 18 or 75 percent of the 24 CFO Act agencies finding it cost effective to employ payment recovery audit methods on contract payments. Twenty-two agencies process grant payments; however, only 11 or 50 percent of those agencies conduct payment recovery audits on those payments. Thirteen agencies or 54 percent process benefit and/or loan payments. Of these 13 agencies, eight (or 62 percent) conduct payment recovery audits on benefit payments but notably, only three (or 23 percent) of the 13 agencies that award loans conduct payment recovery audits on loans. The results indicate that the return on investment for payment recovery audits is higher for contracts than for other types of payments.

Payment Recovery Audit Methods

Agencies were asked to identify who performs payment recovery audit activities from the following options: recovery audit firms, agency staff, technology (data-mining or data-sharing), and Office of the Inspector General (OIG) staff. Three agencies[12] or 13 percent cited "not cost effective" as the reason for not employing any payment recovery audit method. The remaining 21 agencies employ at least one payment recovery audit method (with 16 of the 21 or 76 percent employing more than one method).

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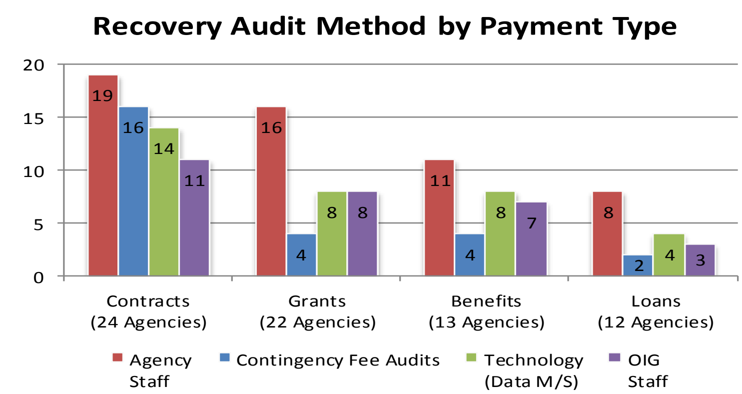
[12] The National Science Foundation, the Nuclear Regulatory Commission, and the Small Business Administration

Agencies were asked to provide further specificity by identifying which method of payment recovery audit they use for contracts, grants, benefits, and loans, respectively. Across each of the four types of payments, agency staff time is utilized more than any other payment recovery audit method[13]. Contingency-fee audits[14] were used in 16 agencies for contracts, and sparingly for other types of awards (in only 4 agencies for grants and benefits, 2 agencies for loans).



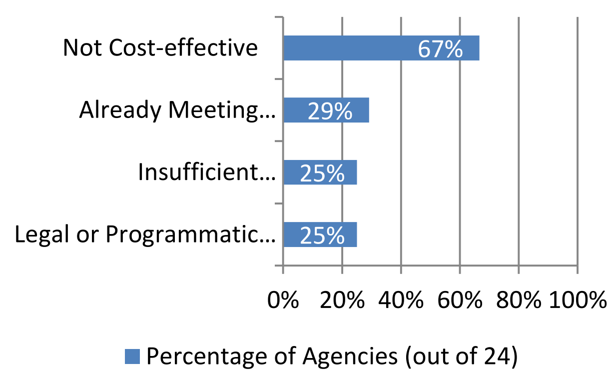
OIG payment recovery efforts are independent of those reported by agencies, but it was positive to find that, for example, 23 percent of agencies making loan payments and 46 percent of agencies making contract payments use the OIG to supplement the agency's own audit activities. This practice is encouraged in the Appendix C guidance on improper payments.

Finally, agencies were asked whether they believed payments other than contracts were conducive to contingency-fee audits. The majority of agencies (15 agencies or 63 percent) expressed a lack of confidence in contingency-fee audits being successful for payments other than contracts. Generally, agencies are not finding contingency-fee audits cost effective for payments other than contracts because of the lower recovery rates and longer time to collect with grant, benefit, and loan payments. Contract payments provide the greatest opportunity for fast recovery of overpayment, and are where contingency-fee auditors focus their efforts.

Reasons for Not Expanding Payment Recovery Audits

Agencies were asked to specify reasons for not further scaling up payment recovery audit activities. Costs were the most prevalent reason for not expanding audit activities, with 16 agencies (67 percent) saying it would not be cost-effective and 6 agencies (25 percent) citing a lack of resources. Another 6 agencies (25 percent) cited legal or programmatic barriers for not expanding their audit activities.

Reasons for Not Expanding Payment Recovery Audit Activities



[13] Agency staff perform payment recovery audit efforts in 19 of 24 agencies for contracts, 16 of 22 for grants, 11 of 22 for benefits, and 8 of 12 for loans.

[14] A "Contingency-Fee Audit" or Contingency Contract is defined in OMB Circular A-123 Appendix C as a contract for payment recapture audit services in which the contractor is paid for its services as a percentage of overpayments actually collected.

Other Internal Controls

Survey results also indicate that internal controls outside of payment recovery audit activities are being used to prevent, identify, and recover improper payments. The most widely cited controls are: OMB A-123 requirements, Single Audits, Contract Closeout Audits, and Program Reviews. Multiple agencies cited the success of internal controls in preventing, identifying, and recovering improper payments for financial assistance while not increasing the burden on award recipients.

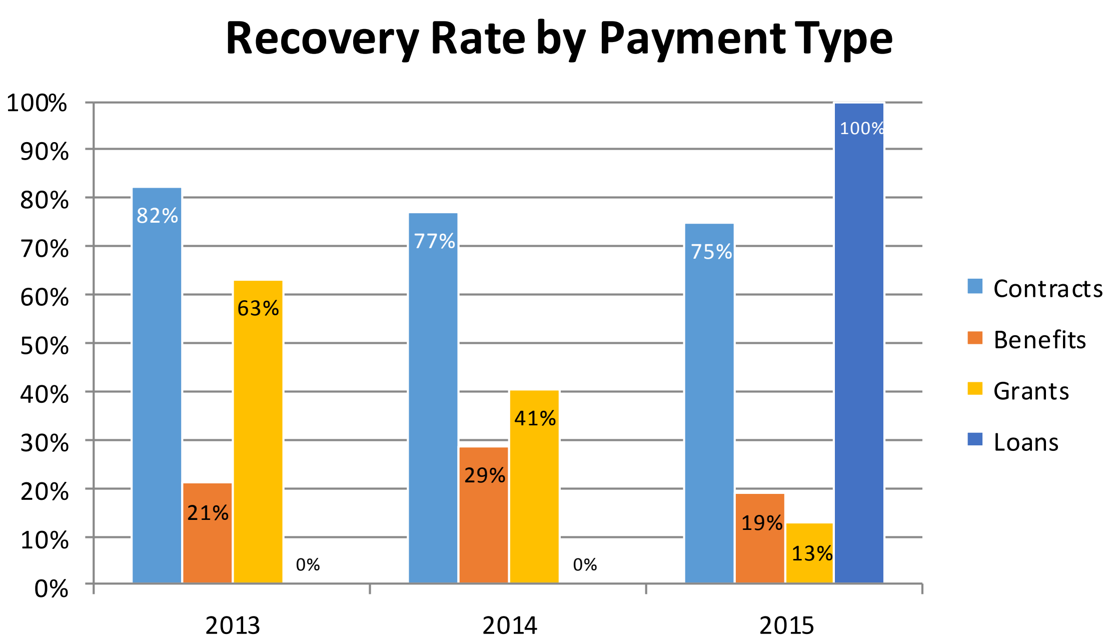
Survey Conclusions

Results of the survey demonstrate that payment recovery audits are primarily effective for contract payments and agencies generally do not identify a cost-effective method of further deploying them. Survey data supports the conclusion that focus is primarily needed on pre-payment efforts and on improving cost effectiveness by allowing agencies to retain a greater percentage of amounts recovered through payment recovery audits.

Review of Agency Reported Information

Between FY 2013 and FY 2015, agencies identified $79.2 billion and recovered $21.6 billion through payment recovery audit efforts alone. Benefit payments recovered were $17.08 billion or 79 percent of the total $21.6 billion recovered. No other category of payment comes close to benefits in total dollars identified or recovered. For contract payments, agencies identified $836.9 million and recovered $630.7 million since FY 2013. For grants, agencies identified $180.4 million and recovered $76.6 million during the same period. Loan payments had zero identified or recovered when rounded in millions until 2015, when $2.08 million was both identified and recovered.

When comparing amounts identified versus recovered, benefit payments have a much lower recovery rate than all other payment types. The $17.08 billion in benefit payments recovered represents only 23 percent of the $73.8 billion identified in benefit payments. Based on this 23 percent recovery rate, payment recovery audits can be considered largely ineffective at recapturing improper benefit payments. For contracts, payment recovery audits can be considered effective in that they return more than 75 percent of all improper payments identified.



Agency-Reported Information Conclusions

This result aligns with the survey results above showing payment recovery audits in use by most CFO Act agencies for contracts and by half of CFO Act agencies that make grant payments. Agency feedback in the survey indicated that it is more cost effective to use payment recovery audits to target contract payments because contractors are more apt to re-pay and there are proven processes to recoup payments. In each case, payment recovery audits are generally only found to be a cost-effective tool when the recovery rate for a specific payment type is high.

Review of Improper Payment/Payment Recovery Audit Literature

Our review of improper payment and payment recovery audit literature from both within and external to Government show remarkably consistent themes indicating a shift from post-payment recapture efforts to pre-payment error prevention. These excerpts show how truly widespread and consistent the call is for additional internal controls/monitoring and information sharing to address improper payments before they happen rather than increased attention on "pay and chase" efforts. Below are relevant excerpts from the literature reviewed:

- ***The Informatica Solution for Improper Payments***[15]
  Informatica, 2012

  Government organizations are shifting from a loss recovery philosophy to a more effective preventative control model. Through early detection, organizations can stop improper payments before they are disbursed and expend fewer resources on recovery efforts. With more data, there are more errors and variations in the identity information associated with records. Upfront data integration and sharing can help Government organizations to more accurately process payments, detect potential errors, resolve data problems that often result in over- or underpayments, and identify areas for improvement.

- ***Federal CFO Insights: Improper Payments – Accountability of CFOs***[16]
  Deloitte, 2015

  Internal controls are the first line of defense, and all controls regarding improper payments should be evaluated for effectiveness and correction of deficiencies. CFOs should ensure that all stakeholders and process owners are kept up to date on the requirements, communicate effectively, and retain proper records to ensure compliance. This agency-wide effort begins with a well-informed and vigilant CFO. These defense mechanisms can be combined with continuous monitoring tools to prevent or quickly identify improper payments.

- ***Improper Payments: Not Just the Purview of the CFO Anymore?***[17]
  Association of Government Accountants, 2011

  The use of business analytics through large databases and data mining holds much promise of reducing improper payments, but to some extent its widespread use depends on people's willingness to accept some loss of privacy. Finally, while it is recognized that states administer much of the assistance provided, it is not the financial operations of the states that causes improper payments—it is the eligibility determination process. Until everyone agrees that all individuals' demographic information must be verified, and furthermore, agrees on what is needed for verification prior to all services and payments being provided, improper payments will still occur.

[15] http://international.informatica.com/Images/02209_informatica-solution-improper-payments_wp_en-US.pdf
[16] http://www2.deloitte.com/content/dam/Deloitte/us/Documents/public-sector/us-fed-improper-payments-04012015.pdf
[17] https://www.agacgfm.org/AGA/ResearchPublications/Documents/CPAG28.pdf

- ***Executive Report: Reducing Improper Payments Through Collaboration***[18]
  Association of Government Accountants, 2013

  In keeping with panelists' desire to avoid the "pay and chase" approach to addressing improper payments, they supported the use of more "front-end" controls. Improved eligibility determination was viewed as a critical need, further reinforcing the need to make clear which Federal resources are available to states to assist in the process.

- ***Addressing Improper Payments and the Tax Gap Would Improve the Government's Fiscal Position***[19]
  Government Accountability Office, 2015

  While fraud can be more difficult to address than other types of improper payments, implementing strategies to reduce improper payments in general may also help to reduce opportunities for fraud. In July 2015, we issued *A Framework for Managing Fraud Risks in Federal Programs* (Framework). The Framework identifies a comprehensive set of leading practices that serve as a guide for program managers to use when developing or enhancing efforts to combat fraud in a strategic, risk-based manner. Minimizing fraud risks in Federal agency programs can help reduce improper payments and enhance program integrity.

- ***Improper Payments: Government-Wide Estimates and Reduction Strategies***[20]
  Government Accountability Office, 2013

  Implementing strong preventative controls can serve as the frontline defense against improper payments. Proactively preventing improper payments increases public confidence in the administration of benefits programs and avoids the difficulties associated with the "pay and chase" aspects of recovering overpayments. Many agencies and programs are in the process of implementing preventative controls to avoid improper payments, including overpayments and underpayments. Preventative controls may involve a variety of activities, such as up-front validation of eligibility, predictive analytic tests, and training programs. Further, addressing program design issues that are a factor in causing improper payments is an effective preventive strategy to be considered.

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[18] www.agacgfm.org/AGA/ResearchPublications/Documents/Intergovernmental-Roundtable-Summary_Oct13_v3_linked.pdf
[19] www.gao.gov/assets/680/672884.pdf
[20] www.gao.gov/products/GAO-14-737T

- ***Testimony of David Mader before the Senate Committee on Homeland Security and Governmental Affairs March 16, 2015***[21]
  United States Controller, Office of Management and Budget

  There is compelling evidence that investments in administrative resources can significantly decrease the rate of improper payments and recoup many times their initial investment. The Social Security Administration (SSA) estimates that continuing disability reviews conducted in FY 2016 will yield net Federal program savings over the next 10 years of roughly $9 on average per $1 budgeted for dedicated program integrity funding, including the Old Age, Survivors, and Disability Insurance Program (OASDI), SSI, and Medicare and Medicaid program effects. Similarly, for HCFAC program integrity efforts, the Centers for Medicare & Medicaid Services (CMS) actuaries conservatively estimate approximately $2 is saved, or payments averted, for every additional $1 spent. Investments in IRS enforcement activities recoup roughly $6 for every $1 spent.

Payment Recovery Audit Literature Conclusions

The examples discussed in this report indicate a widespread shift in improper payment reduction methodology is underway. Unless changes can be made to increase the cost-effectiveness of payment recovery audits, they are likely to remain primarily a tool focused on contract payments. Additional efforts to chase improperly made payments are likely to be less effective than preventative measures. This shift in focus will not reduce payment recovery audit efforts, but instead add value in areas where payment recovery audits have not been cost effective.

[21] www.hsgac.senate.gov/hearings/examining-federal-improper-payments-and-errors-in-the-death-master-file

Recommendations

- **Build on Recovery Audit Success:**
  Recovery audits are most effective at returning contract dollars and are widely used by most CFO Act agencies. While limitations on effectiveness exist when recovery audits are used for other payment types, recovery audits recovered over $21 billion during the period studied and will continue to be an effective tool in the improper payment reduction effort. Consideration should be given to increasing the amount agencies are allowed to retain from recovered payments to increase the cost effectiveness of payment recovery audits.

- **Accelerate the Shift from "Pay and Chase" to Prevention:**
  While recovering improper payment contract dollars is relatively straightforward with a buyer-seller relationship, this is not true for all types of payments. Pre-payment efforts to increase data verification and validation should be encouraged and accelerated to target these payments. Additional emphasis on this approach should not only reduce the improper payment rate, but would also improve the information available to payment recovery audit programs when improper payments are made.

Appendix A: Payment Recovery Audit Survey Results

Survey Participants:

Department of Agriculture
Department of Commerce
Department of Defense
Department of Education
Department of Energy
Department of Health and Human Services
Department of Homeland Security
Department of Housing and Urban Development
Department of Justice
Department of Labor
Department of State
Department of the Interior
Department of the Treasury
Department of Transportation
Department of Veterans Affairs
Environmental Protection Agency
General Services Administration
National Aeronautics and Space Administration
National Science Foundation
Nuclear Regulatory Commission
Office of Personnel Management
Small Business Administration
Social Security Administration
United States Agency for International Development

Survey Questions and Responses

Question #1: Which of the following types of payments does your agency employ?

	Contracts	Grants	Benefits	Loans
Count of Agencies (out of 24)	24	22	13	13
Percentage of Agencies (out of 24)	100%	92%	54%	54%

Question #2: For which of the following types of payments does your agency conduct payment recapture audits?

	Contracts	Grants	Benefits	Loans
Count of Agencies (out of 24)	18	11	8	3
Percentage of Agencies that employ payment recapture audits	75%	50%	62%	23%

Question #3: Which of the following types of payment recapture audit methods does your agency currently employ?

	Recovery audit firms	Agency Staff	Technology (data-mining/ sharing)	OIG Staff
Count of Agencies (out of 24)	14	16	8	8
Percentage of Agencies (out of 24)	58%	67%	33%	33%

Question #4: Excluding contract dollars, your agency's payments are conducive to contingency-fee audits?

	TRUE	FALSE
Count of Agencies	9	15
Percentage of Agencies (out of 24)	38%	63%

Question #5: List any other oversight activities (ex. Single Audits) that your agency already employs, which could be leveraged to recapture improper payments. (Open-ended question)

Most popular answers: A-123 Appendix C requirements, Single Audits, Contract Closeout Audits, Program Reviews

Question #6: Regarding your agency's payments, please select each payment recapture audit instrument you believe fits the type of payment.

	Contracts (24 agencies)				Benefits (13 agencies)			
	Contingency Fee Audits	Agency Staff	Technology (Data M/S)	OIG Staff	Contingency Fee Audits	Agency Staff	Technology (Data M/S)	OIG Staff
Count of Agencies	16	19	14	11	4	11	8	7
% of Applicable Agencies Using Instrument	67%	79%	58%	46%	31%	85%	62%	54%

	Grants (22 agencies)				Loans (12 agencies)			
	Contingency Fee Audits	Agency Staff	Technology (Data M/S)	OIG Staff	Contingency Fee Audits	Agency Staff	Technology (Data M/S)	OIG Staff
Count of Agencies	4	16	8	8	2	8	4	3
% of Applicable Agencies Using Instrument	18%	73%	36%	36%	15%	62%	31%	23%

Question #7: If applicable, list any reasons for not expanding payment recapture audit activities to the level required by IPERA.

	Already Meeting Requirements	Not Cost-effective	Insufficient Resources	Legal or Programmatic Barriers
Count of Agencies	7	16	6	6
Percentage of Agencies (out of 24)	29%	67%	25%	25%

Appendix B: Payment Recovery Audit Table

	2013			2014			2015			Total		
	Identified	Recovered	Rate	Identified	Recovered	Rate	Identified	Recovered	Rate	Identified	Recovered	Rate
Contracts	$47.2	$38.8	82%	$55.9	$43.1	77%	$733.8	$548.9	75%	$836.9	$630.7	75.36%
Benefits	$23,463.5	$4,938.3	21%	$26,240.8	$7,558.5	29%	$24,127.3	$4,584.2	19%	$73,831.5	$17,081.0	23.14%
Grants	$43.7	$27.6	63%	$113.8	$46.1	41%	$22.8	$2.9	13%	$180.4	$76.6	42.48%
Loans	$0.0	$0.0	0%	$0.0	$0.0	0%	$2.1	$2.1	100%	$2.1	$2.1	100.00%
Total	**$27,810.5**	**$8,744.5**	**31%**	**$26,471.7**	**$7,679.2**	**29%**	**$24,940.7**	**$5,177.3**	**21%**	**$79,223.0**	**$21,601.0**	**27.27%**